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REARDEN MOVA LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

REARDEN LLC and REARDEN MOVA LLC,
California limited liability companies,

Plaintiffs,

vs.

WALT DISNEY PICTURES, a California
corporation,

Defendant.

Case No. 4:17-cv-04006-JST

**REVISED OMNIBUS DECLARATION
OF JERROD C. PATTERSON IN
SUPPORT OF PLAINTIFFS'
OPPOSITIONS TO DEFENDANT'S
MOTIONS IN LIMINE**

PER COURT ORDER (ECF NO. 538)

Date: October 27, 2023
Time: 2:00 p.m.
Judge: Hon. Jon S. Tigar
Ctrm.: 6 (2nd Floor)

1 I, JERROD C. PATTERSON, declare as follows:

2 1. I am a Partner with Hagens Berman Sobol Shapiro LLP, and I am one of the firm's
3 lawyers representing the plaintiffs in this case. I have personal knowledge of the facts stated in this
4 declaration except as expressly stated otherwise, and I could testify with respect to those facts under
5 oath if called upon to do so.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of a June 26, 2016 email from
7 Darren Hendler produced in this litigation as WD-DD3-GL0000739. This document is filed publicly
8 per ECF No. 538.

9 3. Attached hereto as Exhibit 2 are true and correct copies of excerpts from the February
10 8, 2023 deposition of O.D. Welch. This document is redacted per ECF No. 538.

11 4. Attached hereto as Exhibit 9 are true and correct copies of excerpts from the June 16,
12 2020 deposition of Greg LaSalle. This document is filed publicly per ECF No. 538.

13 5. Attached hereto as Exhibit 10 are true and correct copies of excerpts from the
14 February 14, 2023 30(b)(6) deposition of Greg LaSalle. This document is filed publicly per ECF No.
15 538.

16 6. Attached hereto as Exhibit 11 are true and correct copies of excerpts from the
17 February 14, 2023 30(b)(1) deposition of Greg LaSalle. This document is filed publicly per ECF No.
18 538.

19 7. Attached hereto as Exhibit 12 are true and correct copies of excerpts from the
20 February 16, 2023 deposition of Darren Hendler. This document is filed publicly per ECF No. 538.

21 8. Attached hereto as Exhibit 13 are true and correct copies of excerpts from the March
22 10, 2023 deposition of Gayle Munro. This document is redacted per ECF No. 538.

23 9. Attached hereto as Exhibit 14 are true and correct copies of excerpts from the
24 February 5, 2023 deposition of Kelly Port. This document is filed publicly per ECF No. 538.

25 10. Attached hereto as Exhibit 17 are true and correct copies of excerpts from the
26 February 22, 2023 deposition of Roger van der Laan. This document is filed publicly per ECF No.
27 538.

1 11. Attached hereto as Exhibit 19 is a true and correct of thumbnails marked as Exhibit
2 1187 at Darren Hendler's February 16, 2022 deposition. This document is filed publicly per ECF No.
3 538.

4 12. I declare that the foregoing is true and correct under penalty of perjury.

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6 DATED: October 25, 2023

Signed in Seattle, Washington, by:

7 /s/ Jerrod C. Patterson

8 Jerrod C. Patterson
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